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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all similarly
situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 4:20-cv-03664-YGR-SVK

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
GOOGLE'S MATERIAL SHOULD BE
SEALED**

CIVIL L.R. 79-5

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC's ("Google") material should be sealed.

Document or Portion of Document Sought to Be Sealed	Party Claiming Confidentiality	Basis for Sealing
Portions highlighted in yellow of Plaintiffs' Motion to Exclude Certain Google Employee Witnesses	Google	Contains Material Designated "Confidential" and/or "Highly Confidential" by Google pursuant to the Protective Order
Entirety of Exhibit 1 to the Frawley Declaration ISO Plaintiffs' Motion to Exclude Certain Google Employee Witnesses	Google	Contains Material Designated "Confidential" and/or "Highly Confidential" by Google pursuant to the Protective Order
Entirety of Exhibit 4 to the Frawley Declaration ISO Plaintiffs' Motion to Exclude Certain Google Employee Witnesses	Google	Material Designated "Confidential" and/or "Highly Confidential" by Google pursuant to the Protective Order
Entirety of Exhibit 6 to the Frawley Declaration ISO Plaintiffs' Motion to Exclude Certain Google Employee Witnesses	Google	Material Designated "Confidential" and/or "Highly Confidential" by Google pursuant to the Protective Order
Entirety of Exhibit 7 to the Frawley Declaration ISO Plaintiffs' Motion to Exclude Certain Google Employee Witnesses	Google	Material Designated "Confidential" and/or "Highly Confidential" by Google pursuant to the Protective Order
Entirety of Exhibit 9 to the Frawley Declaration ISO Plaintiffs' Motion to Exclude Certain Google Employee Witnesses	Google	Contains Material Designated "Confidential" and/or "Highly Confidential" by Google pursuant to the Protective Order
Entirety of Exhibit 10 to the Frawley Declaration ISO Plaintiffs' Motion to Exclude Certain Google Employee Witnesses	Google	Contains Material Designated "Confidential" and/or "Highly Confidential" by Google pursuant to the Protective Order
Entirety of Exhibit 12 to the Frawley Declaration ISO Plaintiffs' Motion to Exclude Certain Google Employee Witnesses	Google	Contains Material Designated "Confidential" and/or "Highly Confidential" by Google pursuant to the Protective Order

1	Entirety of Exhibit 13 to the Frawley Declaration ISO Plaintiffs' Motion to Exclude Certain Google Employee Witnesses	Google	Contains Material Designated "Confidential" and/or "Highly Confidential" by Google pursuant to the Protective Order
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3			
4	Entirety of Exhibit 14 to the Frawley Declaration ISO Plaintiffs' Motion to Exclude Certain Google Employee Witnesses	Google	Contains Material Designated "Confidential" and/or "Highly Confidential" by Google pursuant to the Protective Order
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6			

7 Under Civil Local Rule 79-5(f), Google, as the designating party, bears the burden of
8 establishing that the designated material is sealable.

9 Dated: September 8, 2023

Respectfully submitted,

10 By: /s/Mark Mao

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